

EXHIBIT 4

Jocelyn Ma

From: Bradford, David J. <dbradford@jenner.com>
Sent: Saturday, October 3, 2020 9:37 AM
To: Jordan Jaffe; Andrea P Roberts; Berry, John; Rachael Meny; Vu, Hong-An; Schuman, Brett
Cc: DL_Uber – AL Team; Debra Grassgreen; Miriam Manning
Subject: Production of Waymo Record

[EXTERNAL EMAIL]

Jordan, John, and Hong-An,

Per our discussion with Jordan earlier this week, Uber will be filing a motion before Judge Alsup, which will seek to modify the “use” restriction in the Waymo protective order to permit Uber’s counsel, to review the record from the Waymo litigation, including the independent software expert’s findings, on an attorney’s eyes only basis. Per your request, we would include a request that Mr. Levandowski’s counsel and Google’s counsel may also review the record on that same basis, based on our further understanding that Waymo (and Google and Mr Levandowski) will not object to the relief sought in the motion. We would also like to confirm that, assuming the motion is granted, and to the extent that Mr. Levndowski or Google seek access to this record, they will seek that access from Waymo and not from Uber. (Given our lack of access to the record, it would be difficult for us to respond to such a request on a reasonably prompt basis). Please confirm this is also agreeable.

Finally, please confirm that you will consent to asking for Judge Alsup to resolve the motion on an expedited timeline, shorter than his standard 35-day process.

Thanks, David

From: Jordan Jaffe <jordanjaffe@quinnemanuel.com>
Sent: Wednesday, September 30, 2020 12:35 PM
To: Ciliberti, Katharine R. <KCiliberti@jenner.com>; Bradford, David J. <dbradford@jenner.com>
Cc: Andrea P Roberts <andreaproberts@quinnemanuel.com>; Debra Grassgreen <dgrassgreen@pszilaw.com>
Subject: RE: preservation stipulation

External Email – Exercise Caution

Yes

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // jordanjaffe@quinnemanuel.com

From: Ciliberti, Katharine R. [<mailto:KCiliberti@jenner.com>]
Sent: Wednesday, September 30, 2020 10:33 AM
To: Jordan Jaffe <jordanjaffe@quinnemanuel.com>; Bradford, David J. <dbradford@jenner.com>
Cc: Andrea P Roberts <andreaproberts@quinnemanuel.com>; Debra Grassgreen <dgrassgreen@pszilaw.com>
Subject: RE: preservation stipulation

[EXTERNAL EMAIL]

Thanks, Jordan.

Can you please confirm that we have authority to put your signature on this and file it?

Thanks,
Katie

From: Jordan Jaffe <jordanjaffe@quinnemanuel.com>
Sent: Wednesday, September 30, 2020 12:12 PM
To: Bradford, David J. <dbradford@jenner.com>
Cc: Ciliberti, Katharine R. <KCiliberti@jenner.com>; Andrea P Roberts <andreaproberts@quinnemanuel.com>
Subject: RE: preservation stipulation

External Email – Exercise Caution
+Andrea

Please see attached further edits.

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // jordanjaffe@quinnemanuel.com

From: Bradford, David J. [<mailto:dbradford@jenner.com>]
Sent: Wednesday, September 30, 2020 9:09 AM
To: Jordan Jaffe <jordanjaffe@quinnemanuel.com>
Cc: Ciliberti, Katharine R. <KCiliberti@jenner.com>
Subject: preservation stipulation

[EXTERNAL EMAIL]

Jordan, given the fast approaching deadline for destruction of Waymo record material and the importance of affording Judge Alsup time to review, we would like to get the agreed stipulation on file today. Please let us know promptly if there is any reason that we cannot do so. Thanks, David

David J. Bradford

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